



**THE MACK FIRM**

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June 5, 2023

**VIA ECF**

Honorable Jessica S. Allen, U.S.M.J.  
U.S. District Court for the District of New Jersey  
Martin Luther King Jr. Building & U.S. Courthouse  
50 Walnut Street  
Newark, New Jersey 07102

**Re: *White, et al. v. Samsung Electronics America, Inc., et al.***  
**Case No. 17-1775 (MCA)(JSA)**

Dear Magistrate Judge Allen:

In accordance with Your Honor's Amended Scheduling Order of May 8, 2023, D.E. 223, the parties respectfully submit a proposed Stipulation and Order Re Electronically Stored Information, attached as Exhibit A, and a proposed Stipulation and Order Pursuant to Fed. R. Evid. 502(d), attached as Exhibit B, for the Court's consideration. The parties also submit a proposed Stipulation and Order Re Privilege Log Content and Timing, Exhibit C, and a proposed Stipulation and Order Re Expert Discovery, Exhibit D.

Thank you for your courtesies and cooperation.

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Respectfully submitted,

s/ Michael R. McDonald  
Michael R. McDonald  
Attorney for Defendant Samsung Electronics  
America, Inc

s/ Mack Press  
Mack Press  
Attorney for Plaintiffs

Enclosures

cc: All Counsel of Record (via ECF)